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LOS ANGELES CENTER FOR COMMUNITY LAW AND ACTION
GINA HONG (SBN 322256)
gina.hong@laccla.org
(213) 342 1572
346 S. Gless St.
Los Angeles, CA 90033
Attorneys for Petitioner

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

LOS ANGELES SUNSHINE COALITION, Petitioner, v. CITY OF LOS ANGELES, Respondent	Case No.: 21STCP02488 **VERIFIED PETITION FOR WRIT OF MANDATE ORDERING COMPLIANCE WITH THE CALIFORNIA PUBLIC RECORDS ACT** [Government Code §§ 6250 *et seq.*; Code of Civil Procedure § 1085]

1. Petitioner seeks a writ of mandate requiring Respondent to immediately make available code-compliant public records requested pursuant to the California Public Records Act ("CPRA"), Government Code § 6250, *et seq.* Petitioner also respectfully requests this Court grant relief in the form of costs of suit, attorney's fees, and other appropriate and just relief resulting from Respondent's unlawful conduct.

PARTIES

2. Petitioner, Los Angeles Sunshine Coalition ("LASC" or "Petitioner"), is an unincorporated association that uses public records requests to collect and publish information about government activity in the Los Angeles area. LASC advocates for transparency in government records and public meetings. For example, LASC recently testified before the Senate Committee on Governance and Finance regarding potential changes in California open government law. LASC is a member of the public within the meaning of §§ 6252(b)-(c).

3. Respondent the City of Los Angeles ("Respondent") is a local public agency within the meaning of Gov. Code §§ 6252(a), (d).

JURISDICTION AND VENUE

4. This court has jurisdiction over this petition pursuant to Gov. Code §§ 6258 & 6259, Code Civ. Proc. § 1085, and Article VI, Section 10 of the California Constitution.

5. Venue is proper in this Court. The records in question, or some portion of them, are situated in the County of Los Angeles, Gov. Code § 6259; the acts or omissions complained of occurred in the County of Los Angeles, Code Civ. Proc. § 393; and Respondent is located in the County of Los Angeles, Code Civ. Proc. § 395.

ALLEGATIONS

6. This dispute arises from the failure of the City of Los Angeles to respond to a request for public records. In January and February of 2021, Petitioner submitted four requests for records to the office of the Los Angeles City Councilmember, District Four ("CD4"). These four requests are the subject of the instant action:

Request No. 1: January 3, 2021

7. **Petitioner's request for public records:** On January 3, 2021, the Petitioner requested electronic mail ("e-mail") communications dated up to January 3, 2021, exchanged between CD4 and certain other city employees ("Request No. 1"). The request specifically asked for communications in original electronic mail ("EML" or ".eml") or mailbox ("MBOX" or ".mbox") format. A true and correct copy of the request is attached as ***Exhibit 1.1.***

8. **Respondent's response:** On January 25, 2021, the Respondent replied with an acknowledgement of Petitioner's request. Between January 25, 2021, and January 26, 2021, the Government Affairs Liaison of CD4 ensured Petitioner that a response to the request was forthcoming. On February 8, 2021, Respondent provided Petitioner with presumably responsive documents in portable document format ("PDF"). That same day, Respondent replied to CD4 via

e-mail to alert them that the documents must be provided in EML or MBOX format, as requested. Respondent did not reply to this e-mail. On February 11, 2021, Petitioner once again contacted CD4 about the file format of their document production. That same day, the Respondent replied, "We are working on correcting the format of the documents," and stated Respondent would provide a timeline for production by February 15, 2021. Petitioner e-mailed the Respondent again on February 23, 2021, March 12, 2021, and March 14, 2021, inquiring about the status of the document production. To date, Respondent has not replied to said e-mails, nor provided code-compliant file formats in response to Petitioner's request. A true and correct copy of all communications described in this paragraph are attached as ***Exhibit 1.2.***

9. **Respondent's violation:** Government Code § 6253.9(a) explicitly provides, "any agency that has information that constitutes an identifiable public record not exempt from disclosure pursuant to this chapter that is in an electronic format shall make that information available in an electronic format when requested by any person…" Respondent failed to provide code-compliant responses to Petitioner's request by failing to provide responsive documents in EML or MBOX formats.

Requests Nos. 2 and 3: February 8, 2021

10. **Petitioner's request for public records:** On February 8, 2021, Petitioner first made a request to CD4 for e-mail communication dated between January 3, 2021 and February 8, 2021, exchanged between CD4 and certain other city employees ("Request No. 2"). A true and correct copy of this request is attached hereto as ***Exhibit 2.1.*** Also on February 8, 2021, Petitioner made another request to CD4 for e-mail communications that meet certain search criteria ("Request No. 3"). A true and correct copy of this request is attached hereto as ***Exhibit 3.1.***

11. **Respondent's response:** On February 23, 2021 Petitioner e-mailed CD4 to inquire as to their responses to Requests Nos. 2 and 3. That same day, CD4 replied, directing the Petitioner to contact a different individual within CD4s office for a status update. Petitioner promptly contacted that different individual. Respondent never replied. On March 12, 2021 and March 14, 2021, Petitioner again contacted CD4 for status updates on Requests Nos. 2 and 3. To date,

Respondent has not responded to Requests Nos. 2 and 3. A true and correct copy of communications described in this paragraph re Request No. 2 are attached hereto as ***Exhibit 2.2.*** A true and correct copy of communications described in this paragraph re Request No. 3 are attached hereto as ***Exhibit 3.2.***

12. **Respondent's violation:** When a member of the public submits a record request to an agency, statute provides that the agency must, within ten days, (1) determine whether the request seeks copies of disclosable public records in the possession of the agency, and (2) promptly notify the requestor of that determination and the reasons therefor. § 6253(c). In statutorily delineated "unusual circumstances," and "only to the extent reasonably necessary to the proper processing of the particular request," this time period may be extended a maximum of 14 days. Gov. Code § 6253(c)-(d). The agency's actual production of documents must also be swift: the law requires that agencies make non-exempt public records available to requestors "promptly." Gov. Code § 6253(b). It is unlawful for an agency "to delay or obstruct the inspection or copying of public records." Gov. Code § 6253(d). Further, should an agency seek to withhold responsive records on the basis of a statutory exemption, "the agency . . . must disclose that fact." *Haynie v. Superior* Court (2001) 26 Cal. 4th 1061, 1072 (citing Gov. Code § 6255). There has been no such disclosure, thus whether exemptions apply to production is thus not at issue in the instant petition. Respondent has failed to respond at all to Petitioner's Requests Nos. 2 and 3.

Request No. 4: February 23, 2021

13. **Petitioner's request for public records:** On February 23, 2021, Petitioner requested that CD4 produce documents related to a Twitter post made by Councilmember of District Four, Nithya Raman, and other records including the Councilmember's calendar entries ("Request No. 4"). A true and correct copy of this request is attached hereto as ***Exhibit 4.1.***

14. **Respondent's response:** On February 23, 2021, Respondent acknowledged receipt of Petitioner's request via e-mail, but did not provide a response to the request. On March 12, 2021, Petitioner requested a status update on the Respondent's request. On March 14, 2021, Respondent replied to Petitioner via e-mail, stating, "We will have materials to you by [end of

day] Monday March 22nd." To date, Petitioner is not in receipt of any further reply or document production in response to this request. A true and correct copy of the communications described in this paragraph are attached hereto as ***Exhibit 4.2.***

15. **Respondent's violation:** When a member of the public submits a record request to an agency, statute provides that the agency must, within ten days, (1) determine whether the request seeks copies of disclosable public records in the possession of the agency, and (2) promptly notify the requestor of that determination and the reasons therefor. § 6253(c). In statutorily delineated "unusual circumstances," and "only to the extent reasonably necessary to the proper processing of the particular request," this time period may be extended a maximum of 14 days. Gov. Code § 6253(c)-(d). The agency's actual production of documents must also be swift: the law requires that agencies make non-exempt public records available to requestors "promptly." Gov. Code § 6253(b). It is unlawful for an agency "to delay or obstruct the inspection or copying of public records." Gov. Code § 6253(d). Further, should an agency seek to withhold responsive records on the basis of a statutory exemption, "the agency . . . must disclose that fact." *Haynie v. Superior* Court (2001) 26 Cal. 4th 1061, 1072 (citing Gov. Code § 6255). There has been no such disclosure, thus whether exemptions apply to production is thus not at issue in the instant petition. Respondent has failed to respond to Request No. 4.

PETITION FOR WRIT OF MANDATE AND RELIEF PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT, GOV. CODE §§ 6250, *et seq*.

16. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 16 above, as if set forth in full.

17. Petitioner is entitled to seek a writ of mandate and declaratory relief in response to violation of the CPRA. Gov. Code § 6258. Petitioner has no plain, speedy, adequate remedy in the ordinary course of law, other than the relief sought in this petition. Code Civ. Proc. § 1086.31.

18. Respondent has a clear, present, ministerial duty to comply with Gov. Code §§ 6250, *et seq*. Respondent has repeatedly acted and continues to act in violation of the CPRA by denying access to public records and information through its failure to timely respond to requests, its

failure to produce documents within a reasonable time, and its failure to produce code-compliant documents in requested electronic formats. Gov. Code §§ 6253(b)-(d), 6253.9(a)

19. Petitioner has performed all conditions precedent to filing this petition. There are no administrative exhaustion requirements under Gov. Code §§ 6250, *et seq.*

20. An actual controversy exists between the parties concerning whether Respondent has engaged in conduct that violates the statutory requirements of the CPRA. A judicial determination to resolve this actual controversy is necessary and appropriate at this time.

REQUEST FOR RELIEF

21. WHEREFORE, Petitioner respectfully requests judgement as follows:

22. That the Court issue a peremptory writ of mandate directing Respondent to make all requested documents available for inspection and provide a quote for direct costs of duplication of the records within 10 days of the Court's order;

23. That the Court enter an order awarding Petitioner its costs of suit and reasonable attorney's fees and costs incurred in bringing this litigation;

24. For such other relief as this Court deems just and proper.

Dated:

Respectfully submitted,

LA CENTER FOR COMMUNITY LAW AND ACTION

By: _____

Gina Hong, Esq.

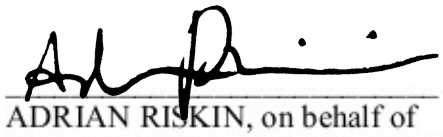
Attorneys for Petitioner

VERIFICATION

I, Adrian Riskin, have read the foregoing Petition for Writ of Mandate and know the contents thereof. The same is true of my own knowledge, except as to those matters alleged on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29TH day of JULY in STAUNTON, VA.

by:



ADRIAN RISKIN, on behalf of
LOS ANGELES SUNSHINE COALITION
Petitioner

EXHIBIT 1.1

Subject: CPRA request (CD4.2021.01.03.a)
From: adrian@123mail.org
Date: 1/3/21, 4:19 PM
To: councilmember.raman@lacity.org

Good afternoon, Councilmember Raman.

I'm hoping to take a look at emails, along with their attachments, in the possession of any CD4 staff or elected held in any account via which public business is done that are dated on or before January 3, 2021 that are to/from/cc/bcc any of the following email addresses:

ackley.padilla@lacity.org
alexis.wesson@lacity.org
rick.coca@lacity.org
anna.hovasapian@lacity.org
patricia.chavez@lacity.org

I need to see these in the MBOX format that CoLA uses to create copies for its own use, as required by the CPRA. Alternatively, EMLs are acceptable as well. Additionally, I need to see the attachments in their own native formats, although this happens automatically when MBOXes are produced. I'm attaching a copy of instructions used by CD12 to produce MBOXes.

Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++ or the like.

Thanks for your prompt attention to this essential matter.

Adrian

Attachments:

CD12_instructions_on_how_to_export_mbox_from_gmail.pdf 130 KB

EXHIBIT 1.2

Subject: Re: CPRA request (CD4.2021.01.03.a)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 1/7/21, 12:48 PM
To: adrian@123mail.org

Hello Adrian,

Thank you for contacting the Office of Councilmember Nithya Raman.

This is to confirm that we are in receipt of your request, and will work to respond as soon as possible with the requested information.

--
Kindly,

Moniquea Roberson
Government Affairs Liaison
District line: 213-473-7004

Download the City of Los Angeles MyLA311 app for smartphones!

MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

---------- Forwarded message ---------
From: <adrian@123mail.org>
Date: Sun, Jan 3, 2021 at 4:20 PM
Subject: CPRA request (CD4.2021.01.03.a)
To: <councilmember.raman@lacity.org>

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Thanks for your prompt attention to this essential matter.

Adrian

Subject: Re: CPRA request (CD4.2021.01.03.a)
From: adrian@123mail.org
Date: 1/25/21, 8:40 AM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>
CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>

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Good morning, Ms. Roberson.

A response to this request was due on January 13, 2021 and is now
almost two weeks overdue. Please advise.

Adrian
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On Thu, Jan 7, 2021, at 12:48 PM, Moniquea Roberson wrote:

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Date: 1/25/21, 9:29 AM
To: adrian@123mail.org
CC: Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>

Good morning, Adrian.

I apologize for the delayed response. I followed up with ITA for the requested documents and am hoping to have them in my hands today. I'll reconnect with you again before the end of today's business. Thank you.

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On Mon, Jan 25, 2021 at 8:40 AM <adrian@123mail.org> wrote:

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To: adrian@123mail.org
CC: Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>, Meghan Choi <meghan.choi@lacity.org>

Good morning, Adrian.

Sorry that I could not connect with you again yesterday. I still have not received a response from ITA. I am very concerned that I haven't heard back from them and will be going up the chain to get further assistance. Once again, I apologize for the delay and assure you that I am working to get the requested information to you ASAP.

Thank you.

Moniquea

On Mon, Jan 25, 2021 at 9:29 AM Moniquea Roberson <moniquea.roberson@lacity.org> wrote:

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CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, "Meghan Choi" <meghan.choi@lacity.org>

Thanks for the information. I would like to see the records as soon as possible, but also, and Mr. Wilson and Mr. Mateljan can confirm this, there's no hard deadline in the law for production, so you're OK there. It's just the response time that's mandatory. So as long as you're working on it in good faith, and it looks like you are, I'm happy.

A.

On Tue, Jan 26, 2021, at 10:55 AM, Moniquea Roberson wrote:

> Good morning, Adrian.
>
> Sorry that I could not connect with you again yesterday. I still have not received a response from ITA. I am very concerned that I haven't heard back from them and will be going up the chain to get further assistance. Once again, I apologize for the delay and assure you that I am working to get the requested information to you ASAP.
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Thanks for your prompt attention to this essential matter.

Adrian

Subject: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: "Moniquea Roberson (via Google Drive)" <drive-shares-noreply@google.com>
Date: 2/8/21, 2:13 PM
To: adrian@123mail.org
CC: bethelwel.wilson@lacity.org, frank.mateljan@lacity.org, jessica.salans@lacity.org, meghan.choi@lacity.org, moniquea.roberson@lacity.org, najeeba.syeed@lacity.org

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photo

Hi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

Open

Use is subject to the Google Privacy Policy

Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Delete visitor session

Logo for Google Drive

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 2/8/21, 2:20 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>
CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, jessica.salans@lacity.org, meghan.choi@lacity.org, najeeba.syeed@lacity.org

Thank you. Can you please make this available to me without requiring me to log into anything to access it?

On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photoHi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

Open

Use is subject to the Google Privacy Policy

Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Logo for Google Drive

Delete visitor session

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/8/21, 2:34 PM
To: adrian@123mail.org
CC: Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>, Jessica Salans <jessica.salans@lacity.org>, Meghan Choi <meghan.choi@lacity.org>, Najeeba Syeed <najeeba.syeed@lacity.org>

I've changed it to viewer access for everyone. Please let me know if this works. Thank you.

On Mon, Feb 8, 2021 at 2:20 PM <adrian@123mail.org> wrote:

> Thank you. Can you please make this available to me without requiring me to log into anything to access it?
>
> On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photo

Hi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

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Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Delete visitor session

Logo for Google Drive

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 2/8/21, 2:42 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>
CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, jessica.salans@lacity.org, meghan.choi@lacity.org, najeeba.syeed@lacity.org

Hi Ms. Roberson,

Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.

You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.

Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.

Thanks,

Adrian

On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photo

Hi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

Open

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Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Delete visitor session

Logo for Google Drive

Attachments:

CD12_instructions_on_how_to_export_mbox_from_gmail.pdf 130 KB

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 2/11/21, 12:26 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>
CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, jessica.salans@lacity.org, meghan.choi@lacity.org, najeeba.syeed@lacity.org

Good morning, Ms. Roberson,

I'm wondering about the status of this request.

Thanks,

A.

On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:

> Hi Ms. Roberson,
>
> Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.
>
> You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.
>
> Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.
>
> Thanks,
>
> Adrian
>
> On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photoHi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

Open

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Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Delete visitor session

Logo for Google Drive

Attachments:

- CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: Meghan Choi <meghan.choi@lacity.org>
Date: 2/11/21, 12:30 PM
To: adrian@123mail.org
CC: Moniquea Roberson <moniquea.roberson@lacity.org>, Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>, Jessica Salans <jessica.salans@lacity.org>, Najeeba Syeed <najeeba.syeed@lacity.org>

Hello Adrian,

We are working on correcting the format of the documents. Thank you for the instructions. I can have an updated timeframe for you by Monday.

Thank you

On Thu, Feb 11, 2021 at 12:27 PM <adrian@123mail.org> wrote:

> Good morning, Ms. Roberson,
>
> I'm wondering about the status of this request.
>
> Thanks,
>
> A.
>
> On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:
>
> > Hi Ms. Roberson,
> >
> > Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.
> >
> > You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.
> >
> > Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 2/11/21, 12:32 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Moniquea Roberson" <moniquea.roberson@lacity.org>, "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, "Jessica Salans" <jessica.salans@lacity.org>, "Najeeba Syeed" <najeeba.syeed@lacity.org>

Thank you so much for your help!

On Thu, Feb 11, 2021, at 12:30 PM, Meghan Choi wrote:

> Hello Adrian,
>
> We are working on correcting the format of the documents. Thank you for the instructions. I can have an updated timeframe for you by Monday.
>
> Thank you
>
> On Thu, Feb 11, 2021 at 12:27 PM <adrian@123mail.org> wrote:
>
>> Good morning, Ms. Roberson,
>>
>> I'm wondering about the status of this request.
>>
>> Thanks,
>>
>> A.
>>
>> On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:
>>
>>> Hi Ms. Roberson,
>>>
>>> Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.
>>>
>>> You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to

> justify it.
>
> Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.
>
> Thanks,
>
> Adrian
>
> On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:
>
>> moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.
>>
>> Adrian - CPRA request (CD4.2021.01.03.a)
>>
>> Unknown profile photoHi Adrian,
>>
>> Thanks for your patience. Attached is the requested information.
>>
>> Kindly,
>>
>> Moniquea
>>
>> Open
>>
>> Use is subject to the Google Privacy Policy
>>
>> Google Drive: Have all your files within reach from any device. Logo for Google Drive

> Staffer B's office.
>
> Thanks,
>
> Adrian
>
> On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:
>
>> moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.
>>
>> Adrian - CPRA request (CD4.2021.01.03.a)
>>
>> Unknown profile photoHi Adrian,
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>> Thanks for your patience. Attached is the requested information.
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>> Kindly,
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>> Moniquea
>>
>> Open
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>> Use is subject to the Google Privacy Policy
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>> Google Drive: Have all your files within reach from any device.
>> Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
>> Delete visitor session
>> Logo for Google Drive
>
> **Attachments:**

- CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 2/23/21, 11:51 AM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Moniquea Roberson" <moniquea.roberson@lacity.org>, "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, "Jessica Salans" <jessica.salans@lacity.org>, "Najeeba Syeed" <najeeba.syeed@lacity.org>

Good morning, all.

I wonder what's going on with this request? Please advise.

A.

On Thu, Feb 11, 2021, at 12:30 PM, Meghan Choi wrote:

> Hello Adrian,
>
> We are working on correcting the format of the documents. Thank you for the instructions. I can have an updated timeframe for you by Monday.
>
> Thank you
>
> On Thu, Feb 11, 2021 at 12:27 PM <adrian@123mail.org> wrote:
>
> > Good morning, Ms. Roberson,
> >
> > I'm wondering about the status of this request.
> >
> > Thanks,
> >
> > A.
> >
> > On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:
> >
> > > Hi Ms. Roberson,
> > >
> > > Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.

> You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.
>
> Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.
>
> Thanks,
>
> Adrian
>
> On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:
>
> > moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.
> >
> > Adrian - CPRA request (CD4.2021.01.03.a)
> >
> > Unknown profile photoHi Adrian,
> >
> > Thanks for your patience. Attached is the requested information.
> >
> > Kindly,
> >
> > Moniquea
> >
> > Open
> >
> > Use is subject to the Google Privacy Policy

> Google LLC, 1600 Amphitheatre Parkway,
> Mountain View, CA 94043, USA
> Delete visitor session
>
> **Attachments:**
>
> - CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

> Google Drive: Have all your files within reach from any device.
> Google LLC, 1600 Amphitheatre Parkway,
> Mountain View, CA 94043, USA
> Delete visitor session
>
> Logo for Google Drive
>
> **Attachments:**
>
> - CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@123mail.org
Date: 3/12/21, 3:48 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Moniquea Roberson" <moniquea.roberson@lacity.org>, "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>, "Najeeba Syeed" <najeeba.syeed@lacity.org>

Good afternoon, all.

Just checking on the status of this. You all promised a response by February 15, which was a month ago.

Thanks,

A.

On Tue, Feb 23, 2021, at 11:51 AM, adrian@123mail.org wrote:

> Good morning, all.
>
> I wonder what's going on with this request? Please advise.
>
> A.
>
> On Thu, Feb 11, 2021, at 12:30 PM, Meghan Choi wrote:
>
> > Hello Adrian,
> >
> > We are working on correcting the format of the documents. Thank you for the instructions. I can have an updated timeframe for you by Monday.
> >
> > Thank you
> >
> > On Thu, Feb 11, 2021 at 12:27 PM <adrian@123mail.org> wrote:
> >
> > > Good morning, Ms. Roberson,
> > >
> > > I'm wondering about the status of this request.
> > >
> > > Thanks,
> > >
> > > A.

> > > On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:
> > >
> > > > Hi Ms. Roberson,
> > > >
> > > > Thanks for this. There are a number of problems with this production. First, you produced emails as PDFs although the law explicitly requires you to produce them in either EML or MBOX format on request. In doing so a huge amount of information was omitted and you have not cited any exemptions to justify it.
> > > >
> > > > You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.
> > > >
> > > > Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.
> > > >
> > > > Thanks,
> > > >
> > > > Adrian
> > > >
> > > > On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:
> > > >
> > > > > moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.
> > > > >
> > > > > Adrian - CPRA request (CD4.2021.01.03.a)
> > > > >
> > > > > Unknown profile photoHi Adrian,
> > > > >
> > > > > Thanks for your patience. Attached is the requested

> > > > > information.
> > > > >
> > > > > Kindly,
> > > > >
> > > > > Moniquea
> > > > >
> > > > > Open
> > > > >
> > > > > Use is subject to the Google Privacy Policy
> > > > >
> > > > > Google Drive: Have all your files within reach from any device.
> > > > > Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
> > > > > Delete visitor session
> > > > >
> > > > > Logo for Google Drive
> > > >
> > > > **Attachments:**
> > > >
> > > > - CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Fwd: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
From: adrian@cityofla.me
Date: 3/14/21, 7:22 PM
To: "Meghan Choi" <meghan.choi@lacity.org>, josh.nuni@lacity.org, Ivette.serna@lacity.org

First outstanding request.

----- Original message -----
From: adrian@123mail.org
To: Meghan Choi <meghan.choi@lacity.org>
Cc: Moniquea Roberson <moniquea.roberson@lacity.org>, Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>, Najeeba Syeed <najeeba.syeed@lacity.org>
Subject: Re: Adrian - CPRA request (CD4.2021.01.03.a) - Invitation to comment
Date: Friday, March 12, 2021 3:48 PM

Good afternoon, all.

Just checking on the status of this. You all promised a response by February 15, which was a month ago.

Thanks,

A.

On Tue, Feb 23, 2021, at 11:51 AM, adrian@123mail.org wrote:

> Good morning, all.
>
> I wonder what's going on with this request? Please advise.
>
> A.
>
> On Thu, Feb 11, 2021, at 12:30 PM, Meghan Choi wrote:
>
> > Hello Adrian,
> >
> > We are working on correcting the format of the documents. Thank you for the instructions. I can have an updated timeframe for you by Monday.
> >
> > Thank you

On Thu, Feb 11, 2021 at 12:27 PM <adrian@123mail.org> wrote:

Good morning, Ms. Roberson,

I'm wondering about the status of this request.

Thanks,

A.

On Mon, Feb 8, 2021, at 2:42 PM, adrian@123mail.org wrote:

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You exported emails to PDF in conversation view instead of as individual files. This deletes even more information from the down-chain emails and again, you've cited no exemptions to justify it.

Please produce these emails in either EML or MBOX format immediately. This can either be done for you by ITA on request or each staff member can do their own according to the attached instructions, prepared by a CD12 staffer for internal use by City Staffer B's office.

Thanks,

Adrian

On Mon, Feb 8, 2021, at 2:13 PM, Moniquea Roberson (via Google Drive) wrote:

moniquea.roberson@lacity.org added you as a commenter. Verify your email to securely comment on this shared folder. You will need to verify your email every 7 days. Learn more.

Adrian - CPRA request (CD4.2021.01.03.a)

Unknown profile photoHi Adrian,

Thanks for your patience. Attached is the requested information.

Kindly,

Moniquea

Open

Use is subject to the Google Privacy Policy

Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Delete visitor session

Logo for Google Drive

Attachments:

- CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

EXHIBIT 2.1

Subject: CPRA request (CD4.2021.02.08.a)
From: adrian@123mail.org
Date: 2/8/21, 2:50 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

Good afternoon, Ms. Roberson.

I'm hoping to take a look at emails, along with their attachments, in the possession of any CD4 staff or elected held in any account via which public business is done that are dated between January 3, 2021 and February 8, 2021 that are to/from/cc/bcc any of the following email addresses:

ackley.padilla@lacity.org
alexis.wesson@lacity.org
rick.coca@lacity.org
anna.hovasapian@lacity.org
patricia.chavez@lacity.org

I need to see these in the MBOX format that CoLA uses to create copies for its own use, as required by the CPRA. Alternatively, EMLs are acceptable as well. Additionally, I need to see the attachments in their own native formats, although this happens automatically when MBOXes are produced. I'm attaching a copy of instructions used by CD12 to produce MBOXes.

Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++ or the like.

Thanks for your prompt attention to this essential matter.

Adrian

Attachments:

CD12_instructions_on_how_to_export_mbox_from_gmail.pdf 130 KB

EXHIBIT 2.2

Subject: Re: CPRA request (CD4.2021.02.08.a)
From: adrian@123mail.org
Date: 2/23/21, 11:52 AM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

Good morning, Ms. Roberson.

A response to this request is long overdue. Please advise.

Thanks,

A.

On Mon, Feb 8, 2021, at 2:50 PM, adrian@123mail.org wrote:

> Good afternoon, Ms. Roberson.
>
> I'm hoping to take a look at emails, along with their attachments, in the possession of any CD4 staff or elected held in any account via which public business is done that are dated between January 3, 2021 and February 8, 2021 that are to/from/cc/bcc any of the following email addresses:
>
> ackley.padilla@lacity.org
> alexis.wesson@lacity.org
> rick.coca@lacity.org
> anna.hovasapian@lacity.org
> patricia.chavez@lacity.org
>
> I need to see these in the MBOX format that CoLA uses to create copies for its own use, as required by the CPRA. Alternatively, EMLs are acceptable as well. Additionally, I need to see the attachments in their own native formats, although this happens automatically when MBOXes are produced. I'm attaching a copy of instructions used by CD12 to produce MBOXes.
>
> Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++ or the like.
>
> Thanks for your prompt attention to this essential matter.
>
> Adrian
>
> Attachments:
> * CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Re: CPRA request (CD4.2021.02.08.a)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/23/21, 12:49 PM
To: adrian@123mail.org

Hello,

I am no longer the point of contact for CPRA requests.

Please follow up with Meghan Choi (meghan.choi@lacity.org) in our office for a status update. Thank you.

Kindly,

Moniquea

On Tue, Feb 23, 2021 at 11:53 AM <adrian@123mail.org> wrote:

> Good morning, Ms. Roberson.
>
> A response to this request is long overdue. Please advise.
>
> Thanks,
>
> A.
>
> On Mon, Feb 8, 2021, at 2:50 PM, adrian@123mail.org wrote:
> > Good afternoon, Ms. Roberson.
> >
> > I'm hoping to take a look at emails, along with their attachments, in
> > the possession of any CD4 staff or elected held in any account via
> > which public business is done that are dated between January 3, 2021
> > and February 8, 2021 that are to/from/cc/bcc any of the following email
> > addresses:
> >
> > ackley.padilla@lacity.org
> > alexis.wesson@lacity.org
> > rick.coca@lacity.org
> > anna.hovasapian@lacity.org
> > patricia.chavez@lacity.org
> >
> > I need to see these in the MBOX format that CoLA uses to create copies
> > for its own use, as required by the CPRA. Alternatively, EMLs are
> > acceptable as well. Additionally, I need to see the attachments in

> > their own native formats, although this happens automatically when
> > MBOXes are produced. I'm attaching a copy of instructions used by CD12
> > to produce MBOXes.
> >
> > Alternatively, you can ask ITA to search for and export the emails in
> > MBOX format for your review, which they do as a matter of course for
> > CPRA requests. Should you care to redact any of these records it's
> > possible to use search/replace in a text editor to replace exempt
> > information in an MBOX by replacing it with innocuous symbols such as
> > ++++++++++ or the like.
> >
> > Thanks for your prompt attention to this essential matter.
> >
> > Adrian
> >
> >
> >
> > Attachments:
> > * CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

Subject: Re: CPRA request (CD4.2021.02.08.a)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/23/21, 1:10 PM
To: adrian@123mail.org
CC: Meghan Choi <meghan.choi@lacity.org>

Adrian,

I apologize again for not cc'ing Meghan on my response; and I'll be certain to do so in the future. Thank you.

Kindly,

Moniquea

On Tue, Feb 23, 2021 at 1:24 PM <adrian@123mail.org> wrote:

> Thanks, Ms. Roberson!
>
> Dear Ms. Choi, for some reason Ms. Roberson found it easier to paste your email address into the body of this email message as well, rather than into the CC field. Anyway, a response is overdue.
>
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> On Tue, Feb 23, 2021, at 12:49 PM, Moniquea Roberson wrote:
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> > Hello,
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> > I am no longer the point of contact for CPRA requests.
> >
> > Please follow up with Meghan Choi (meghan.choi@lacity.org) in our office for a status update. Thank you.
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> > On Tue, Feb 23, 2021 at 11:53 AM <adrian@123mail.org> wrote:
> > > Good morning, Ms. Roberson.
> > >
> > > A response to this request is long overdue. Please advise.

Thanks,

A.

On Mon, Feb 8, 2021, at 2:50 PM, adrian@123mail.org wrote:
> Good afternoon, Ms. Roberson.
>
> I'm hoping to take a look at emails, along with their attachments, in
> the possession of any CD4 staff or elected held in any account via
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> alexis.wesson@lacity.org
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Subject: Re: CPRA request (CD4.2021.02.08.a)
From: adrian@123mail.org
Date: 2/23/21, 1:24 PM
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CC: "Meghan Choi" <meghan.choi@lacity.org>

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From: adrian@123mail.org
Date: 3/12/21, 3:50 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Bethelwel Wilson" <bethelwel.wilson@lacity.org>, "Frank Mateljan" <frank.mateljan@lacity.org>

Good afternoon, Ms. Choi.

A response to this was due on February 18.

Thanks!

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On Tue, Feb 23, 2021, at 1:10 PM, Moniquea Roberson wrote:

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> Attachments:
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Subject: Fwd: Re: CPRA request (CD4.2021.02.08.a)
From: adrian@cityofla.me
Date: 3/14/21, 7:23 PM
To: "Meghan Choi" <meghan.choi@lacity.org>, josh.nuni@lacity.org, ivette.serna@lacity.org

Second outstanding request.

----- Original message -----
From: adrian@123mail.org
To: Meghan Choi <meghan.choi@lacity.org>
Cc: Bethelwel Wilson <bethelwel.wilson@lacity.org>, Frank Mateljan <frank.mateljan@lacity.org>
Subject: Re: CPRA request (CD4.2021.02.08.a)
Date: Friday, March 12, 2021 3:50 PM

Good afternoon, Ms. Choi.

A response to this was due on February 18.

Thanks!

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On Tue, Feb 23, 2021, at 1:10 PM, Moniquea Roberson wrote:

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> Attachments:
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EXHIBIT 3.1

Subject: CPRA request (CD4.2021.02.08.b)
From: adrian@123mail.org
Date: 2/8/21, 3:12 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

Good afternoon, Ms. Roberson.

I'm hoping to take a look at emails, along with their attachments, in the possession of any CD4 staff or elected held in any account via which public business is done that are dated February 8, 2021 or before and which meet any of the following criteria:

1. Are to/from/cc/bcc any email address at a domain OTHER THAN lacity.org or lapd.online that have attachments

OR

2. Are to/from/cc/bcc any LASAN staff

OR

3. Have any of the words:

a. sweep
b. sweeps
c. encampment

I need to see these in the MBOX format that CoLA uses to create copies for its own use, as required by the CPRA. Alternatively, EMLs are acceptable as well. Additionally, I need to see the attachments in their own native formats, although this happens automatically when MBOXes are produced. I'm attaching a copy of instructions used by CD12 to produce MBOXes.

Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++ or the like.

Thanks for your prompt attention to this essential matter.

Adrian

Attachments:

CD12_instructions_on_how_to_export_mbox_from_gmail.pdf 130 KB

EXHIBIT 3.2

Subject: Re: CPRA request (CD4.2021.02.08.b)
From: adrian@123mail.org
Date: 2/23/21, 11:53 AM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

Good morning, Ms. Roberson.

A response to this request was due some time ago and yet no response has been forthcoming. Please advise.

A.

On Mon, Feb 8, 2021, at 3:12 PM, adrian@123mail.org wrote:

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Subject: Re: CPRA request (CD4.2021.02.08.b)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/23/21, 12:48 PM
To: adrian@123mail.org

Hello,

I am no longer the point of contact for CPRA requests.

Please follow up with Meghan Choi (meghan.choi@lacity.org) in our office for a status update. Thank you.

Kindly,

Moniquea

On Tue, Feb 23, 2021 at 11:53 AM <adrian@123mail.org> wrote:

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Subject: Re: CPRA request (CD4.2021.02.08.b)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/23/21, 1:08 PM
To: adrian@123mail.org
CC: Meghan Choi <meghan.choi@lacity.org>

Dear Adrian:

Apologies for not cc'ing Meghan on the email. I'll be sure to do so in the future. Thank you.

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CC: meghan.choi@lacity.org

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Subject: Re: CPRA request (CD4.2021.02.08.b)
From: adrian@123mail.org
Date: 3/12/21, 3:51 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Frank Mateljan" <frank.mateljan@lacity.org>, "Bethelwel Wilson" <bethelwel.wilson@lacity.org>

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From: adrian@cityofla.me
Date: 3/14/21, 7:24 PM
To: "Meghan Choi" <meghan.choi@lacity.org>, ivette.serna@lacity.org, josh.nuni@lacity.org

Third outstanding request... and the fourth was the one you emailed a reply to just now, although it too is as yet unresponded too although a response is long overdue.

----- Original message -----
From: adrian@123mail.org
To: Meghan Choi <meghan.choi@lacity.org>
Cc: Frank Mateljan <frank.mateljan@lacity.org>, Bethelwel Wilson <bethelwel.wilson@lacity.org>
Subject: Re: CPRA request (CD4.2021.02.08.b)
Date: Friday, March 12, 2021 3:51 PM

Good afternoon, Ms. Choi.

A response to this was due on February 18.

Thanks!

A.

On Tue, Feb 23, 2021, at 1:08 PM, Moniquea Roberson wrote:

Dear Adrian:

Apologies for not cc'ing Meghan on the email. I'll be sure to do so in the future. Thank you.

Kindly,

Moniquea

On Tue, Feb 23, 2021 at 1:22 PM <adrian@123mail.org> wrote:

Thanks, Ms. Roberson.

Ms. Choi, for some reason Ms. Roberson found it easier to paste your email address into the body of her response rather than the CC field

or whatever, so behold this overdue request, still lacking a response.

A.

On Tue, Feb 23, 2021, at 12:48 PM, Moniquea Roberson wrote:

Hello,

I am no longer the point of contact for CPRA requests.

Please follow up with Meghan Choi (meghan.choi@lacity.org) in our office for a status update. Thank you.

Kindly,

Moniquea

On Tue, Feb 23, 2021 at 11:53 AM <adrian@123mail.org> wrote:

Good morning, Ms. Roberson.

A response to this request was due some time ago and yet no response has been forthcoming. Please advise.

A.

On Mon, Feb 8, 2021, at 3:12 PM, adrian@123mail.org wrote:
> Good afternoon, Ms. Roberson.
>
> I'm hoping to take a look at emails, along with their attachments, in
> the possession of any CD4 staff or elected held in any account via
> which public business is done that are dated February 8, 2021 or before
> and which meet any of the following criteria:
>
> 1. Are to/from/cc/bcc any email address at a domain OTHER THAN
> lacity.org or lapd.online that have attachments
>
> OR
>

> 2. Are to/from/cc/bcc any LASAN staff
>
> OR
>
> 3. Have any of the words:
>
> a. sweep
> b. sweeps
> c. encampment
>
> I need to see these in the MBOX format that CoLA uses to create copies
> for its own use, as required by the CPRA. Alternatively, EMLs are
> acceptable as well. Additionally, I need to see the attachments in
> their own native formats, although this happens automatically when
> MBOXes are produced. I'm attaching a copy of instructions used by CD12
> to produce MBOXes.
>
> Alternatively, you can ask ITA to search for and export the emails in
> MBOX format for your review, which they do as a matter of course for
> CPRA requests. Should you care to redact any of these records it's
> possible to use search/replace in a text editor to replace exempt
> information in an MBOX by replacing it with innocuous symbols such as
> +++++++++++ or the like.
>
> Thanks for your prompt attention to this essential matter.
>
> Adrian
>
>
>
> Attachments:
> * CD12_instructions_on_how_to_export_mbox_from_gmail.pdf

EXHIBIT 4.1

Subject: CPRA request (CD4.2021.02.23.a)
From: adrian@123mail.org
Date: 2/23/21, 12:08 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

Good afternoon, Ms. Roberson.

Recently your boss tweeted that "you're especially discouraged from voting no on stuff that's not in your district."

https://twitter.com/nithyavraman/status/1363221709772365827

I am interested in records related to the means by which "you're especially discouraged" as well as records related to the means by which other traditional/social norms of City Council are communicated to new members. To that end I need to take a look at the following material:

1. All communication in any format, which may include but not be limited to email, Google Hangouts, Slack, Discord, Google Chat, text messages, those things on iPhones which are kind of like text messages but not really, etc., that communicates "[discouragement] from voting no on stuff that's not in your district."

2. All records relating to LA City Council ethnomethodologies. Maybe there are users' manuals for City services? Handbooks for how to file motions, run committees, etc. Instruction manuals for council staff? Flowcharts for how to accomplish various tasks? Something called "The Art of Staffing the CM"? I know that your boss's predecessor had a copy of this record. If it's still around there somewhere I need that.

3. All chat logs on any subject in the possession of CD4 staff and elected.

4. Any orientation materials received by CD4 on the occasion of the CW's ascension to power. (If your boss prefers CM or something else please let me know!

5. Calendar entries, notes, agendas, minutes, and any other records generated in relation to meetings where council methodology or culture intended as orientation was slated to be discussed (as opposed to randomly happened to be discussed because it just came up).

6. Ms. Raman's daily calendar since her ascension. It's OK with me if you want to export this to PDF as I have no idea what the native format is. If you do this please be sure that the calendar client is set to show the most detailed view of each day's events. That is, no event should be collapsed from the view option chosen before export.

I need to see any of these records that are kept in electronic formats in those precise formats. For emails this means the MBOX format that CoLA uses to create copies for its own use, as required by the CPRA. Alternatively, EMLs are acceptable as well. Additionally, I need to see the attachments in their own native formats, although this happens automatically when MBOXes are produced. I'm attaching a copy of instructions used by CD12 to produce MBOXes.

Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++

or the like.

Thanks for your prompt attention to this essential matter.

Adrian

EXHIBIT 4.2

Subject: Re: CPRA request (CD4.2021.02.23.a)
From: Moniquea Roberson <moniquea.roberson@lacity.org>
Date: 2/23/21, 12:44 PM
To: adrian@123mail.org

Hello,

I am forwarding your request to Meghan Choi in our office for review/response. Thank you.

--
Kindly,

Moniquea Roberson
Government Affairs Liaison
District line: 213-473-7004

Download the City of Los Angeles MyLA311 app for smartphones!

MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

On Tue, Feb 23, 2021 at 12:08 PM <adrian@123mail.org> wrote:

Good afternoon, Ms. Roberson.

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https://twitter.com/nithyavraman/status/1363221709772365827

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2. All records relating to LA City Council ethnomethodologies. Maybe there are users' manuals for City services? Handbooks for how to file motions, run

committees, etc. Instruction manuals for council staff? Flowcharts for how to accomplish various tasks? Something called "The Art of Staffing the CM"? I know that your boss's predecessor had a copy of this record. If it's still around there somewhere I need that.

3. All chat logs on any subject in the possession of CD4 staff and elected.

4. Any orientation materials received by CD4 on the occasion of the CW's ascension to power. (If your boss prefers CM or something else please let me know!

5. Calendar entries, notes, agendas, minutes, and any other records generated in relation to meetings where council methodology or culture intended as orientation was slated to be discussed (as opposed to randomly happened to be discussed because it just came up).

6. Ms. Raman's daily calendar since her ascension. It's OK with me if you want to export this to PDF as I have no idea what the native format is. If you do this please be sure that the calendar client is set to show the most detailed view of each day's events. That is, no event should be collapsed from the view option chosen before export.

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Alternatively, you can ask ITA to search for and export the emails in MBOX format for your review, which they do as a matter of course for CPRA requests. Should you care to redact any of these records it's possible to use search/replace in a text editor to replace exempt information in an MBOX by replacing it with innocuous symbols such as ++++++++++ or the like.

Thanks for your prompt attention to this essential matter.

Adrian

Subject: Re: CPRA request (CD4.2021.02.23.a)
From: adrian@123mail.org
Date: 2/23/21, 1:16 PM
To: "Moniquea Roberson" <moniquea.roberson@lacity.org>

`Thank you for acknowledging receipt of this request.`

On Tue, Feb 23, 2021, at 12:44 PM, Moniquea Roberson wrote:

Hello,

I am forwarding your request to Meghan Choi in our office for review/response. Thank you.

--
Kindly,

Moniquea Roberson
Government Affairs Liaison
District line: 213-473-7004

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On Tue, Feb 23, 2021 at 12:08 PM <adrian@123mail.org> wrote:

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I am interested in records related to the means by which "you're especially discouraged" as well as records related to the means by which other traditional/social norms of City Council are communicated to new members. To that end I need to take a look at the following material:

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2. All records relating to LA City Council ethnomethodologies. Maybe there are users' manuals for City services? Handbooks for how to file motions, run committees, etc. Instruction manuals for council staff? Flowcharts for how to accomplish various tasks? Something called "The Art of Staffing the CM"? I know that your boss's predecessor had a copy of this record. If it's still around there somewhere I need that.

3. All chat logs on any subject in the possession of CD4 staff and elected.

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Thanks for your prompt attention to this essential matter.

Adrian

Subject: Re: CPRA request (CD4.2021.02.23.a)
From: adrian@123mail.org
Date: 3/12/21, 3:54 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: "Frank Mateljan" <frank.mateljan@lacity.org>, "Bethelwel Wilson" <bethelwel.wilson@lacity.org>

Good afternoon, Ms. Choi.

A response to this request was due last Friday. As you can see, your office did receive the request and, so kindly, acknowledged receipt. However, a response is also required, and by the Constitution of the State of California itself, a document which, I'm pretty sure, your boss swore an oath to respect and defend. Please advise.

A.

On Tue, Feb 23, 2021, at 1:16 PM, adrian@123mail.org wrote:

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>
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> > Hello,
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> > I am forwarding your request to Meghan Choi in our office for review/response. Thank you.
> >
> > --
> > Kindly,
> >
> > Moniquea Roberson
> > Government Affairs Liaison
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> >
> > ***Download the City of Los Angeles MyLA311 app for smartphones!***
> >
> > MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.
> >
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> > >
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> > >
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> > >
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> > >
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> > >
> > > Thanks for your prompt attention to this essential matter.
> > >
> > > Adrian

Subject: Re: CPRA request (CD4.2021.02.23.a)
From: Meghan Choi <meghan.choi@lacity.org>
Date: 3/14/21, 7:05 PM
To: adrian@123mail.org
CC: Frank Mateljan <frank.mateljan@lacity.org>, Bethelwel Wilson <bethelwel.wilson@lacity.org>

Hi Adrian,

I am so sorry I have been so slow to produce requests. We now have our full legislative team and they will be handling any future CPRA requests. Ivette.serna@lacity.org and Josh.nuni@lacity.org will be able to ensure that requests are fulfilled properly and in a timely manner. I will finish out your two outstanding CRPA requests.

Item 3 may be the only one with no discoverable materials. The city uses a google suite and does not keep records of gchat history.

We will have materials to you by EOD Monday March 22nd.

Thank you.

On Fri, Mar 12, 2021 at 3:54 PM <adrian@123mail.org> wrote:

```
Good afternoon, Ms. Choi.

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your office did receive the request and, so kindly, acknowledged
receipt. However, a response is also required, and by the
Constitution of the State of California itself, a document which,
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--
Kindly,

Moniquea Roberson
Government Affairs Liaison
District line: 213-473-7004

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https://twitter.com/nithyavraman/status/1363221709772365827

I am interested in records related to the means by which "you're especially discouraged" as well as records related to the means by which other traditional/social norms of City Council are communicated to new members. To that end I need to take a look at the following material:

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CW's ascension to power. (If your boss prefers CM or something else please let me know!

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6. Ms. Raman's daily calendar since her ascension. It's OK with me if you want to export this to PDF as I have no idea what the native format is. If you do this please be sure that the calendar client is set to show the most detailed view of each day's events. That is, no event should be collapsed from the view option chosen before export.

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Adrian

Subject: Re: CPRA request (CD4.2021.02.23.a)
From: adrian@123mail.org
Date: 3/14/21, 7:21 PM
To: "Meghan Choi" <meghan.choi@lacity.org>
CC: Ivette.serna@lacity.org, Josh.nuni@lacity.org

Thanks, Ms. Choi.

First of all, I have four outstanding requests. If you're under the impression that I only have two I hope your staff will check again. I will resend copies momentarily.

Second of all, I realize that the City Attorney told you to say that "The city uses a google suite and does not keep records of gchat history." I've been hearing various versions of this nonsensical tale for seven years now, including your predecessor as CD4 CoS. It's just not relevant. Obviously no chat client in the world erases messages before they're read. I can't imagine that there's a chat client that automatically erases messages as soon as they're answered, along with the responses. Therefore even though the City intentionally chose to not keep chat history longer than 24 hours, there are going to be some messages in people's chat clients from time to time. The question is whether any CD4 staff had any chat messages in their possession on February 23, 2021 at 12:08 PM.

By the way, hello Josh! Nice to meet again...

a.

On Sun, Mar 14, 2021, at 7:05 PM, Meghan Choi wrote:

Hi Adrian,

I am so sorry I have been so slow to produce requests. We now have our full legislative team and they will be handling any future CPRA requests. Ivette.serna@lacity.org and Josh.nuni@lacity.org will be able to ensure that requests are fulfilled properly and in a timely manner. I will finish out your two outstanding CRPA requests.

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District line: 213-473-7004

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